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October 4, 2021

Hon. Magistrate Judge Barbara Moses

District Judge

United States District Court, Southern District of New York

Re : Digno Quituisaca Tapia, individually and on behalf of others similarly situated v. Nations Roof East, LLC (d/b/a Nations Roof East LLC), Nations Roof of New York, LLC. (d/b/a Nations Roof East LLC), Patricia Donohue, Michael Johannes, Sal Doe, Jose Doe, Andy Doe, Mata Doe, and David Doe

Index No. : 1:21-cv-01358

PMT File No. : NATR-00102/JLB

Honorable Magistrate Judge Moses:

This office represents the defendants Nations Roof East, LLC, Nations Roof of New York, LLC., Patricia Donohue and Michael Johannes in the above captioned action.

The parties have consented to participate in the court sponsored mediation program and are currently scheduled for a settlement conference with Magistrate Judge Barbara Moses on October 7, 2021 at 2:15 p.m. I write to provide supplemental information in support of my request for an adjournment filed on October 1, 2021. The defendants need additional time to obtain information necessary to prepare and submit our mediation position statement/supporting evidence and engage in meaningful settlement discussions. My client has been away, thus it has taken longer than anticipated to gather the necessary information/evidence. I have spoken with counsel for plaintiff Clela Errington on October 1, 2021, and she agreed to an adjournment.

There have been no prior mediations/settlement conferences scheduled and no prior requests to adjourn to the conference.

Since our letter/motion filed on October 1, 2021, Plaintiff's counsel, Clela Errington, has confirmed Plaintiff's availability to attend a settlement conference on October 21, 2021 at 2:15 and November 9, 2021 at 2:15. Thus, all parties and Magistrate Judge Moses (as confirmed by Chambers on October 1, 2021) are available to participate in a settlement conference on either these dates. Thus, we propose an adjourn date of the settlement conference/mediation currently scheduled for October 7, 2021 to October 21, 2021 or November 9, 2021 at 2:15.



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Thank you for your consideration.

Very truly yours,

PILLINGER MILLER TARALLO, LLP

By JENNIFER L. BUDNER
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JLB/trl

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